

SHAWN HALBERT  
California SBN 179023  
Law Offices of Shawn Halbert  
214 Duboce Avenue  
San Francisco, California 94103  
Telephone: (415) 515-1570  
Facsimile: (415) 255-8631  
shawn@shawnhalbertlaw.com

Attorney for Defendant  
RICKY JOSEPH

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 23-CR-191 AMO
	)	
Plaintiff,	)	STIPULATION AND ORDER TO CONTINUE
	)	COURT DATE FROM JANUARY 6, 2025 TO
v.	)	JANUARY 21, 2025 AND TO EXCLUDE TIME
	)	UNDER THE SPEEDY TRIAL ACT
RICKY JOSEPH	)	
	)	
Defendant.	)	
	)	
	)	

**STIPULATION**

1. The case is currently set for status before this court on January 6, 2025 at 10:30 a.m.
2. Defendant is in custody pursuant to this court's order of detention on December 20, 2025.
3. The parties request that the date be continued to January 21, 2025 in order for the defense to review discovery and meet with Mr. Joseph. Further, defense counsel is unavailable on January 6, 2025.
4. The parties stipulate and agree that it would be appropriate to exclude the time from January 6, 2025 through January 21, 2025 under the Speedy Trial Act to allow for effective preparation of and continuity of counsel, taking into account the exercise of due diligence. *See* 18 U.S.C. §§ 3161(h)(7)(A), (B)(iv). The parties further stipulate and agree that the ends of justice served

1 by excluding the time from January 6, 2025 through January 21, 2025 from computation under  
2 the Speedy Trial Act outweigh the best interests of the public and defendant in the prompt  
3 resolution of this case. *See id.* The parties further stipulate and agree that they either did or  
4 intended to stipulate that the time between December 20, 2024 and January 6, 2025 was  
5 excludable under the Speedy Trial Act for the same reasons as outlined above, for effective  
6 preparation of and continuity of counsel, taking into account the exercise of due diligence, and  
7 that the ends of justice served by excluding the time outweigh the best interests of the public and  
8 defendant in the prompt resolution of this case. *See* 18 U.S.C. §§ 3161(h)(7)(A), (B)(iv).

9 Counsel for Mr. Joseph certifies that she has obtained approval from counsel for the United  
10 States to file this stipulation and proposed order.

11 IT IS SO STIPULATED.

12 DATED: January 3, 2025

/s/ Shawn Halbert

SHAWN HALBERT

Attorney for Defendant Ricky Joseph

15 DATED: January 3, 2025

ISMAIL RAMSEY

United States Attorney

/s/ with permission

JONATHAN LEE

Assistant United States Attorney

**ORDER**

Based upon the representations of counsel and for good cause shown, the Court finds that this matter should be continued from January 6, 2025 to January 21, 2025 at 10:30 a.m.

The Court further finds that that failing to exclude the time from December 20, 2024 through January 21, 2025 would unreasonably deny defense counsel continuity of counsel, taking into account the exercise of due diligence. *See* 18 U.S.C. §§ 3161(h)(7)(A), (B)(iv). The Court further finds that the ends of justice served by excluding the time from December 20, 2024 through January 21, 2025 from computation under the Speedy Trial Act outweigh the best interests of the public and defendant in a speedy trial. *See* § 3161(h)(7)(A).

Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that this matter shall be continued from December 20, 2024 through January 21, 2025 at 10:30 a.m., and that the time from December 20, 2024 through January 21, 2025 shall be excluded from computation under the Speedy Trial Act. *See id.*

**IT IS SO ORDERED** this 3rd day of January, 2025.

  
\_\_\_\_\_  
THE HONORABLE KANDIS A. WESTMORE  
United States Magistrate Judge